

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jinson Lasluisas-Rios and Julio Rodriguez 1-7777777

(b) County of Residence of First Listed Plaintiff Union
(EXCEPT IN U.S. PLAINTIFF CASES)

615-517-1111 (City Name, Address, Telephone Number)

Pro Se

DEFENDANTS

Popular Financial, BLB Trading LLC, Dembo & Saldutti, KML Law Group and et al... 1-666666

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED
MAR 26 2018

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
			IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
☒ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

common law fraud

Brief description of cause: False foreclosure claims, predatory lending, false statements, perjury.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE John Malon, Frederick kessler, Joseph P

DOCKET NUMBER F-015833-14 and F-141163-0

DATE
March 26th, 2018SIGNATURE OF ATTORNEY OF RECORD
Jinson Lasluisas-Rios and Julio Rodriguez

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW JERSEY
CIVIL DIVISION**

JINSON LASLUISAS,

JULIO RODRIGUEZ.,

DOE PLAINTIFF'S 1-7777777 or et al.,

PLAINTIFF, / PLAINTIFF'S.

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED
2018 MAR 26 P 1:46

Vs.

CIVIL ACTION

CONSTRUCTIVE FRAUD

POPULAR INC. COMPANY, "The Bank"

POPULAR FINANCIAL SERVICES, LLC, "The Bank"

JOHN N. MARTELLA, "Vice President"

EQUITY ONE, INC., "The Bank"

ACQURA LOAN SERVICES, "The Bank"

VANTIUM CAPITAL, "The Bank"

CLEAR SPRING LOAN SERVICES, "The Bank"

JBN PORTFOLIO INVESTORS, LLC, "The Bank"

JEFFREY A. KRAMER, "assignor" Managing Member

JUDY ROBINSON, "Notary"

P A PORTFOLIO INVESTORS, LLC, "The Bank"

Plaintiff's

Jinson Lasluisas

615 Montgomery Street

Elizabeth NJ 07202

954.579.7562

Julio Rodriguez

11020 Clubhouse Rd

Pembroke Pines Fl 33026

----- /

“CONSTRUCTIVE FRAUD”

COMPLAINT AND JURY DEMAND

Under the Federal Civ R.38,Right to Jury Trial;

Under the Federal Civ R.38(b) Demand.

Under the Federal Civ R.38(c) Demand the Right to Jury Trial The Whole case.,

Under the 7Th Amendment of the Constitution of the United States.

The Plaintiff's Jinson Lasluisas and Julio Rodriguez et al., Sues the Defendant's For Money Damages and States; And Bring This Complaint Base on the Following Causes of Action, Facts and Law :

Fraudulent misrepresentation

Predatory lending

Fraud

Deception

Trickery

Unscrupulousnes

Constructive Fraud

Lack of Information

Double dealing

Lack of Justice

Misconduct

Due process

Violation of the Consumer Fraud Act

Bad Faith and Unfair Dealing

The New Jersey and Unfair Trade Practices Act

The common Law Fraud

The Fraud Prevention Act

The New Jersey Insurance Fraud Act

Discrimination

Conflict of Interest

The Tort Clause Act

Breach of its legal duty

False Statements

Perjury

Violation of Truth in Lending

Violation of Respa

Obstruction of Justice

COMPLAINT

**Plaintiff's Jinson Lasluisas and Julio Rodriguez Sues Defendant's For
Money Damages and Says:**

JURISDICTIONAL ALLEGATIONS

This is an action for money damages in excess of \$ 50,000.00

At all times material to this lawsuit, Plaintiff's Jinson Lasluisas and Julio Rodriguez were residents of Union County New Jersey.

All acts necessary or precedent to the bringing of this lawsuit occurred or accrued in Union County, New Jersey.

This court has jurisdiction.

NOW COMES Respectfully Plaintiff's Jinson Lasluisas and Julio Rodriguez individually requesting this Court to issue a declaratory Judgement, Preliminary and Permanent Injunctive Relief for the Damages caused by the Defendant's. In support thereof, Plaintiff shows onto the Court Hereby and states as follows: This is a civil Action whereby Plaintiff's seeks preliminary and Permanent Injunctive Relief Joining Defendant's: POPULAR INC. COMPANY, "The Bank"
POPULAR FINANCIAL SERVICES, LLC, "The Bank"
JOHN N. MARTELLA, "Vice President"
EQUITY ONE, INC., "The Bank"
ACQURA LOAN SERVICES, "The Bank"
VANTIUM CAPITAL, "The Bank"
CLEAR SPRING LOAN SERVICES, "The Bank"
JBN PORTFOLIO INVESTORS, LLC, "The Bank"
JEFFREY A. KRAMER, "assignor" Managing Member
JUDY ROBINSON, "Notary"
P A PORTFOLIO INVESTORS, LLC, "The Bank"
CHRIS FERRITER, "witness"
FARAH FLORES, "witness"
DEMBO & SALDUTTI llp, "Dumbo".
BRIAN J. SHAFFER, Esquire.
BLB TRADING INC, "The Bank"
KML LAW GROUP, PC.,
KRISTINA G. MURTHA, Esq.

COLLEN M. HIRST, Esq.

MELISSA A LUCAS, "paralegal"

ALEX SULLIVAN,"paralegal"

NATALIE ROWAN "paralegal"

ARACELI V. DIAZ "Legal Assistant"

CRS AGENCY FOR ALL REAL ESTATE NEEDS,

PETER VASQUEZ, "Realtor Associate"

"HONORABLE" JOSEPH PERFILIO "On-Call Judge" PENDING, Plaintiff's need a Court Order to Audit All Foreclosure Cases Processed by this Judge. Probable Treason AND Participant of this Mob. This Judge has strong ties with lenders., And other conspirators, agents,servants, and employees and those acting in active concert and with actual notice thereof, engaging in further violations of Fraudulent misrepresentation
Predatory lending

Fraud

Deception

Trickery

Unscrupulousnes

Constructive Fraud

Lack of Information

Double dealing

Lack of Justice

Misconduct

Due process

Violation of the Consumer Fraud Act

Bad Faith and Unfair Dealing

The New Jersey and Unfair Trade Practices Act

The common Law Fraud

The Fraud Prevention Act

The New Jersey Insurance Fraud Act

Discrimination

Conflict of Interest

The Tort Clause Act

Breach of its legal duty

False Statements

Perjury

Violation of Truth in Lending

Violation of Respa

An actual controversy exists between the parties, in that challenged actions of the DEFENDANTS have caused and will continue to cause the plaintiff's substantial harm unless the request relief is granted.

Venue is proper, because many of the relevant events occurred within Union County in the State of New Jersey, which is located within this District, Therefore , This Court has Jurisdiction, also pursuant to the following statutes:

28 U.S.C. 1331, which gives district courts original jurisdiction over civil actions arising under the constitution, laws or treaties of the United States;

28 U.S.C. 1343 (3) and (4), which gives district courts jurisdiction over actions secure civil rights extended by the United States government;

28 U.S.C. 1367, which gives the district courts supplemental jurisdiction over state claims.

Plaintiff's Federal and State Law claims against the Defendant's derive from a common focus of operative facts and are of such character that plaintiff's would ordinarily be expected to try them in one Jury Trial proceeding. Consequently this court has pending jurisdiction over Plaintiff's State law Claims against the Defendant's THEREFORE Venue is appropriate in this judicial district under 28 U.S.C. 139 (b) because the events that gave rise to this Complaint occurred in this district.

Property location for subject matter 615 - 617 Montgomery Street, Elizabeth NJ 07202
Home in possession of Plaintiff Julio Rodriguez., Ex-business partner for Plaintiff Jinson Lasluisas.

This is an action brought by the Plaintiff's Jinson Lasluisas and Julio Rodriguez for violations of the above named Acts in connection with a purported breach of the covenant of good faith and fair dealing. against the Defendant's for Constructive Fraud. This court has jurisdiction.

GENERAL FACTUAL ALLEGATIONS

Before November 10, 2006 Plaintiff Jinson J. Lasluisas a government employee for the City of Elizabeth, Plaintiff had an excellent credit of almost 800 Fico score, **SEE EXHIBIT A** employment where Plaintiff have had dedicate all his life to support his family his wife and three babies especially Gina who is especial and suffers from down syndrome and was intervene plenty times in the hospital. Plaintiff Jinson J. Lasluisas at the time of loan was making a salary of above \$27,670.00 per year. **SEE EXHIBIT B** Plaintiff Jinson J. Lasluisas was already the owner of a one family story of the subject property before construction. Plaintiff Jinson J. Lasluisas was dedicated to his work to support his family and never went to college. Plaintiff Jinson J. Lasluisas is an ignorant of the language of mortgages, law, and construction contracts., Plaintiff Jinson J. Lasluisas barely understands and speaks english or can't write in english.

On November 10, 2006 the Plaintiff Jinson J. Lasluisas and Defendant Popular Financial Services LLC, and entered into a written agreement whereby Defendant Popular Financial Services LLC, promised to lend \$487,500.00 for the construction of a three family story with an interest rate of 10% variable and loan to to be secured by ABC insurance or security company., Insurance or Security where Defendant Defendant Popular Financial Services LLC, will be paid after a 90 day of Plaintiff's default and with a promise that plaintiff could refinance the loan six months after the construction conclude. Defendant Popular Financial Services LLC, also charged a plus rate index extra of 1.75% per annum.

Defendant Popular Financial Services premeditated elaborated an ambiguous false abuse contract in order to take advantage of the gullibility and ignorance of Plaintiff Jinson J. Lasluisas.

Defendant Popular Financial Services LLC, at the time of execution of elaboration of the false or abuse contract charged a predatory interest of 10% plus 1.75% per annum plus an extra 5% knowingly that Plaintiff Jinson J. Lasluisas will be on default at any time according with Plaintiff's Jinson J. Lasluisas income.

During the construction process Defendant Popular Financial Services LLC, failed on making the payments on time as agreed with Plaintiff Jinson J. Lasluisas. breaching the false abuse contract.

Defendant Popular Financial Services LLC, secured the loan knowingly that Plaintiff Jinson J. Lasluisas will collapse on his payments according to Plaintiff's financials.

Defendant Popular Financial Services LLC, not just secured the loan but had double dealing negotiated with other banks, services, investors, realtors, brokers, judges, and the mob, conspirators to deceit Plaintiff Jinson J. Lasluisas by making a false foreclosure complaint and false statements in the state court. **SEE EXHIBIT C**

Defendant Popular Financial Services LLC, collected its securitization when declared loan by Plaintiff Jinson J. Lasluisas on default. loan was paid.

Defendant Popular Financial Services LLC, made a unilateral ambiguous and false contract that was never signed by Plaintiff Jinson J. Lasluisas. contract never merit / contract was void by its illegality from the beginning or signed on duress due to its construction but rely on the good faith of lender popular financial.

Defendant Popular financial services LLC, corrupt and / or incompetent conspired with BIB Trading LLC, POPULAR INC. COMPANY, "The Bank" POPULAR FINANCIAL SERVICES, LLC, "The Bank" JOHN N. MARTELLA, "Vice President" EQUITY ONE, INC., "The Bank" ACQURA LOAN SERVICES, "The Bank" VANTIUM CAPITAL, "The Bank" CLEAR SPRING LOAN SERVICES, "The Bank" JBN PORTFOLIO INVESTORS, LLC, "The Bank" JEFFREY A. KRAMER, "assignor" Managing Member JUDY ROBINSON, "Notary" P A PORTFOLIO INVESTORS, LLC, "The Bank" CHRIS FERRITER, "witness" FARAH FLORES, "witness" DEMBO & SALDUTTI llp, "Dumbo". BRIAN J. SHAFFER, Esquire. BLB TRADING INC, "The Bank" KML LAW GROUP, PC., KRISTINA G. MURTHA, Esq. COLLEN M. HIRST, Esq. MELISSA A LUCAS, "paralegal" ALEX SULIVAN, "paralegal" NATALIE ROWAN "paralegal" ARACELI V. DIAZ "Legal Assistant" CRS AGENCY FOR ALL REAL ESTATE NEEDS, PETER VASQUEZ, "Realtor Associate" Ex Honorable Chancery Judge John Malone of Union County New Jersey., "HONORABLE" JOSEPH PERFILIO "On-Call Judge" with strong ties with the mob., and Judge Paul Innes from Trenton., Foreclosure Unit trenton New Jersey, signing off on judgements of possession with out having subject matter jurisdiction over land possession issues and with out performing any hearings. **SEE EXHIBIT D**

Defendant Popular financial Services LLC, at all times lack with information the Plaintiff's Jinson J. Lasluisas and Julio Rodriguez needed to perform a audit of the loan Defendant ignoring and denying their rights to the information making it impossible to

refinance or find a solution and see and evaluate what the supposed lender did., Exhaust attempts to contact the lender were made. **SEE EXHIBIT E**

As a direct result, Plaintiff lost the value of the property, credit was severely damage and their family were in jeopardy and destroy.

Defendants Popular Financial Services LLC, promised to refinance the loan after six months, to minimized that devastating interest rate of 10% annum and an extra 1.75% plus per annum. and an extra hiding of 5.0% per annum plus other interest and an exaggerated attorney fees.

Defendants Popular Financial Services LLC, fail to refinance the Plaintiff's Jinson J. Lasluisas in order to eliminate the usury interest rate e illegal from the false contract.

On or about May 6, 2009 Defendants Equity One, Inc together with the Law Firm of Dembo & Saldutti, LLP, William F. Saldutti III, falsely filed a foreclosure complaint saying they were the plaintiff's of the loan Docket # F-14163-09 for \$513,624.88 together with accrued interest 10.00% against the Plaintiff Jinson J. Lasluisas et al, Defendants' Equity One and William F. Saldutti III certified that the complaint "was true" **SEE EXHIBIT F** and certified by the lawyer representing the Defendants at that time with his signature that the complaint was true. Defendants Equity One, Dembo & Saldutti LLP, and William F Saldutti III never presented any evidence that Defendants have had any withstanding in court, or a binding or legal contract however lawyers at the time of hearings will go inside the chambers of ex-Judge John Malone at the superior court and try speech less the Plaintiff's Jinson J. Lasluisas and Julio Rodriguez.

On May 1, 2009 Defendant William F. Saldutti, III as a designate of trial counsel for the law firm of Dembo & Saldutti III under Rule 4:25-4 Defendant William F. Saldutti III signed a certification under the Rule 4:51 and Rule 4:64-1(a) that the statements made by the Defendant's on behalf of Defendant Equity One were truth **SEE EXHIBIT G** also were aware that if any of the foregoing statements made by the were false were subject of punishment. From their own false complaint.

At some time in July 2009 Plaintiff Julio Rodriguez advised the chancery court of Judge John Malone that they did not have jurisdiction on this matter and have inside information from his court corruption also mentioned that by the Judge having private meetings in his chambers were discriminating against the Plaintiff's Jinson J. Lasluisas and Julio Rodriguez not excluding their constitution rights.

At some time Judge John Malone retired after his recklessness, or incompetency, or even conspiracy, injured thousands of property owners and forced people out of their properties by issuing fraudulent judgments of possession without having any subject matter jurisdiction and without performing any hearing or trial and without providing any notice. Judge Malone ignored Plaintiff's Jinson Lasluisas motion to compel and counter claim plus other motions and was having private communication with the Defendants attorneys William F. Saldutti III inside his chambers.

As a direct result, lost the value of property, the right to refinance, or even a loan modification. However contract was illegal, fraudulent, corrupt from beginning with the intention to deceit the plaintiff's Jinson Lasluisas and Julio Rodriguez.

on or above May 21, 2013 was a hearing in the court of the Honorable Frederic S. Kessler, whom were having an argument with an attorney from Dembo & Saldutti by

the name of Brian J. Schaffer. Case was dismissed due that the Defendants Did not have withstand on the complaint and has not interest, court decided equity One can't obtain summary judgment. and case was dismiss. **SEE EXHIBIT H**

At some time after this hearing the Honorable Frederick S. Kessler retired. Case was dismissed and due to a debt between the Plaintiff's Jinson J. Lasluisas and Julio Rodriguez gave the ownership to Plaintiff Julio Rodriguez. transaction made through the Batista & Batista Law Firm. Plaintiff's Jinson J Lasluisas and Julio Rodriguez since may 21, 2013 through April 14, 2014 did not heard or knew any thing from any lender only treats at the property with many people saying they were the owners but wouldn't identified themselves but post paper on property saying they were owners and belongings were going to be remove. **SEE EXHIBIT I**

However at some time on April 14, 2014. BLB Trading, LLC, filed another false foreclosure complaint saying that the allegations were truth, certification was made again by the Dembo and Salutti law firm, signing another certification under the state Rules 4:51 and Rule 4:64-1(a) "omg" **SEE EXHIBIT J** (I don't know what law school they went to or how Dumbo they are your Honor). But as a direct result of their perjury, corruption, false complaints, false motions, Plaintiff's Jinson J. Lasluisas and Julio Rodriguez lost their credit, business, THE IMPACTO NEWS CORP., THE ACCESS NEWS CORP., J. RODRIGUEZ INVESTMENT LLC., ONE SMART FINANCIAL CORP., ETC... and families were destroy.

At the time Defendant's BLB Trading LLC, filed for a new false complaint was bar by the statute of limitations, was not just bar by statute of limitations but have had

Notwithstanding and also was in contempt to the United states Federal Court, Plaintiff Jinson J. Lasluisas was discharge from the debt due to a chapter 7 bankruptcy SEE EXHIBIT K discharge of debt was on July 22, 2011. Plaintiff was represented by Andril & Espinosa. AND also strongly believe that Judge Joseph P. Perfilio was assigned to shield their activities.

Defendant's EQUITY ONE, INC., "The Bank" ACQURA LOAN SERVICES, "The Bank" VANTIUM CAPITAL, "The Bank" CLEAR SPRING LOAN SERVICES, "The Bank" JBN PORTFOLIO INVESTORS, LLC, "The Bank", JEFFREY A. KRAMER, "assignor" Managing Member, JUDY ROBINSON, "Notary", P A PORTFOLIO INVESTORS, LLC, "The Bank", CHRIS FERRITER, "witness", FARAH FLORES, "witness" DEMBO & SALDUTTI llp, "Dumbo". , BRIAN J. SHAFFER, Esquire., BLB TRADING INC, "The Bank", KML LAW GROUP, PC., KRISTINA G. MURTHA, Esq., COLLEN M. HIRST, Esq., MELISSA A LUCAS, "parallegal", ALEX SULIVAN, "parallegal", NATALIE ROWAN "parallegal", ARACELI V. DIAZ "Legal Assistant", CRS AGENCY FOR ALL REAL ESTATE NEEDS, PETER VASQUEZ, "Realtor Associate", Remax Ace Realty, Vince Taliercio., Have Not Withstanding on a foreclosure proceeding against the Plaintiff's Jinson Lasluisas or Julio Rodriguez. Defenadants' s are not the Original lenders, contract is in-question and invalid, have had never show evidence proving the have legal standing in court with evidence, actually some of those Defendants are in question of being members of the mob in which were already on an investigation and indicted by the attorney generals in other states as well as disciplinary conducts.

Defendant Popular financial Services is the only one that would have a cause of action on this matter However can't proceed against the Plaintiff's for the following

reasons 1. already was paid by the securitization, 2. never have had a valid contract, 3. committed intentional and constructive Fraud, 4. debt was already discharge on the United States bankruptcy court, and is Bar by the statute of limitations., etc...

Defendant's POPULAR INC. COMPANY, "The Bank", POPULAR FINANCIAL SERVICES, LLC, "The Bank", JOHN N. MARTELLA, "Vice President", EQUITY ONE, INC., "The Bank", ACQURA LOAN SERVICES, "The Bank", VANTIUM CAPITAL, "The Bank", CLEAR SPRING LOAN SERVICES, "The Bank", JBN PORTFOLIO INVESTORS, LLC, "The Bank", JEFFREY A. KRAMER, "assignor" Managing Member JUDY ROBINSON, "Notary", P A PORTFOLIO INVESTORS, LLC, "The Bank" CHRIS FERRITER, "witness", FARAH FLORES, "witness", DEMBO & SALDUTTI llp, "Dumbo". , BRIAN J. SHAFFER, Esquire., BLB TRADING INC, "The Bank", KML LAW GROUP, PC., KRISTINA G. MURTHA, Esq., COLLEN M. HIRST, Esq., MELISSA A LUCAS, "parallegal", ALEX SULIVAN, "parallegal", NATALIE ROWAN "parallegal" ARACELI V. DIAZ "Legal Assistant", CRS AGENCY FOR ALL REAL ESTATE NEEDS, PETER VASQUEZ, "Realtor Associate", does work together with court officers to confuse and radar their operations they refer their people to the different agencies so they could be shield and know whats going on with each case 1. State Judges., they do not have jurisdiction on most of those cases do those loans were made base on federal law 2. Office of Foreclosure, they make decisions on final judgements on a case that is supposed to be in trial, 3. foreclosure unit at Trenton NJ, once your file a case they or some one communicate the opponent via phone and even change dates on their behalf, at some times they refuse to file a motion and act as lawyers without license, and directed the Defendants to file wrong motions, when some one is a Pro se they induce

them to file the wrong motions. Plaintiff's found the new and old way The shameless state Judges whom in this case the court call it the on call Judge Joseph Perfilio from the union county superior court of New Jersey, Plaintiff's Jinson Lasluisas and Julio Rodriguez wrote plenty of motions to this judge whom ignored and when answer or denied a motion you could notice he was on their behalf conspiring with the Defendants, not one works for free and he is in that court to make business on the behalf of the banks. Plaintiff Jinson Lasluisas and Julio Rodriguez that Judge Joseph Perfilio have strong ties with this kind of activities do that he is a private bank without license and may be a part of the mob with the mention defendants above. "HONORABLE" JOSEPH PERFILIO "On-Call Judge" PENDING, Plaintiff's need a Court Order to Audit All Foreclosure Cases Processed by this Judge. Probable Treason AND Participant of this Mob. This Judge has strong ties with lenders.

Defendant's have had mention before above that they have well connections in place in the courts and offices, Defendant's also sent different leg brokers to the Plaintiff's property making them scare and asking them to move out before something happens to them, also law firms were inducing the tenants that they don't have to pay rents to the Plaintiff's. At some time during the past years Defendants Peter Vasquez, CRS Agency "for all your Real Estate Needs" came to the subject property asking every one to move out **SEE EXHIBIT L** because they were the new owners of subject property, Defendants posted papers all over the property and have trucks and several people ready to move things out of the property. As a direct result Not just tenants move out scare but did Not pay for rent, and property was vacant for a while also as a direct result Plaintiff's Jinson Lasluisas and Julio Rodriguez have had to hide their families on

different address due to Defendant's death threats. Defendant Peter Vasquez confronted Plaintiff Julio Rodriguez and said " you are wasting your time fighting for this house we have all courts and judges covered and it is a matter of time we put your shit out of the property and finish with you and your family. on about

February month of 2018 a man by the name of Vince Tallercio came inside the property criminal trespassing without a court Order to scare tenants one of the tenants that is actually pregnant with a baby. Mr. Tallercio also mentioning that belongings were going to be remove from the property ON A DIRECT VIOLATION OF TENANTS RIGHTS

SEE EXHIBIT M All this tenants have a legal lease and deposits made and due to the circumstances of the false lenders have had pay in advance their rents.

Plaintiff's Jinson Lasluisas and Julio Rodriguez have had call the New Jersey Superior Court to have the dates and Order of Final Judgement signed by the Judge Paul Innes but they answered what dates and what orders that is handle by the foreclosure office and they don't have a phone number therefore Plaintiff's haven't been able to answer properly and Plaintiff's are being discriminated and lack of prosecution by the New Jersey State Court together with the office of foreclosure whom definitely was build to protect the mob's law firms representing those banks.

Plaintiff's Jinson Lasluisas and Julio Rodriguez found out that Not Judge had a decision on such final judgement signed by judge Paul Innes which is a direct violation of the Plaintiff's legal rights and constitution rights.

WHEREFORE, plaintiff demands judgment against the defendants, mentioned above individual, and Doe Any other 1 - 100, for damages together with interest, costs, and attorney's fees, pro-se time fees, aggravation, mental suffering, nervousness, grief,

anxiety, shock, humiliation, indignity and physical pain, see, Gruenberg Vs aetna Insurance , Bello v Merrimack Mut. Fire Ins. Co Therefore Plaintiff Demand Defendants for 5,000.000.00 per Defendant to pay the plaintiff's Jinson Lasluisas- Rios and julio Rodriguez plus punitive damages.

DESIGNATION OF TRIAL CONSEL

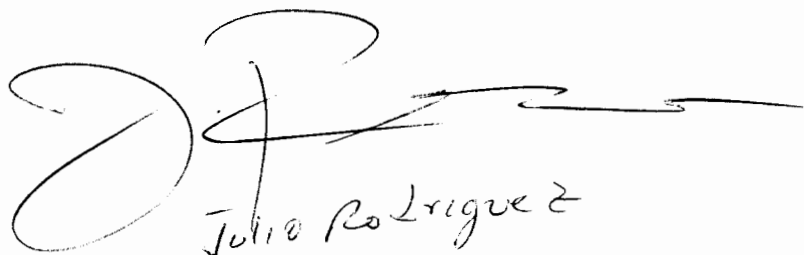
The plaintiff's ask this court to assign a Pro Bone Counsel for the Plaintiff's Jinson Lasluisas- Rios and Julio Rodriguez.

JURY DEMAND

PLEASE TAKE NOTICE that the plaitiff's herein does hereby demand a trial by jury of the within cause of action on all issues and will rely on the 7th amendment of the constitution of the United States, and according to the rules of the common law.



Jinson J Lasluisas



Julio Rodriguez